

## EXHIBIT B

**From:** Beral, Arash  
**Sent:** Monday, August 4, 2025 11:23 AM  
**To:** Tirtasaputra, Meeghan H.  
**Cc:** Malynn, Todd M.; Schiraldi, Michael V.; Arjam, Farshid; Follett, Matthew; Murphy, Michael D.; Nwasike, Jessica; Gilmore, Jamison  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)  
**Attachments:** Proposed Verdict Form.docx; Proposed Statement of the Case.docx

Meeghan,

We are almost finished with our edits to the jury instructions. Suggest your team and our team get on a call to discuss them and determine if we could narrow disputes. We'll get those over to you very shortly. In the meantime, we took a crack at a new proposed joint statement of the case, intended to be as objective and neutral as possible. Please review. Please review the verdict form attached.

Arash

**Arash Beral** | BLANKROME  
2029 Century Park East, Los Angeles, CA 90067  
[Arash Beral](#) | [Blank Rome LLP](#)

---

**From:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>  
**Sent:** Monday, August 4, 2025 9:47 AM  
**To:** Beral, Arash <arash.beral@blankrome.com>  
**Cc:** Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <Farjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Thanks, Arash. We should have the other docs to you shortly.

Best,  
Meeghan



---

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**From:** Beral, Arash <arash.beral@blankrome.com>

**Sent:** Monday, August 4, 2025 9:45 AM

**To:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>

**Cc:** Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <Farjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>

**Subject:** [EXT] Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Almost ready. Where are you guys on the rest of the docs?

On Aug 4, 2025, at 8:44 AM, Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)> wrote:

Arash,

I'm following up on the verdict form and jury instructions we sent over on Friday. Please let us know when you'll be circulating those with your changes / additions.

Best,  
Meeghan

**Meeghan H. Tirtasaputra**

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 5:45 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V.

<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett,  
Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D.  
<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore,  
Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H.  
<[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

In accordance with the Court's Civil Pretrial and Trial Order (dkt. 30), we separated the jury instructions into joint, separate, and clean. Accordingly, attached are the following documents for your review:

1. Proposed joint jury instructions (containing the agreed upon jury instructions)
2. SPAVI's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
3. PCJV's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
4. Clean proposed jury instructions (containing only the agreed upon jury instructions for now but which will need to include the disputed once those are finalized) (made in accordance with the court's civil pretrial and trial order as well as the Court's clean jury instruction template on its website)
5. Revised verdict form

If you have any questions or concerns, please let us know.

Best,  
Meeghan



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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 2:58 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

we have taken it upon ourselves to reformat all of these documents to make sure that they are compliant with the Court order particularly. You're not gonna get them today. You will get them likely at some point this weekend. My request is that you make sure that all of the objections and information and complaints and grievances that you have are stated in the current document so that we can make sure that they make in the properly formatted documents. We're not gonna be able to get into the endless cycle of objection counter objection, and counter counter objection anymore. We have much more serious things to worry about. As soon as I have an update as to win, we will get you final documents to approve, I will let you know.

Highberger goes please do not communicate with his courtroom without copying me.

---

**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Friday, August 1, 2025 2:50:22 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Mike,

Following up. We need your materials to review over the weekend. Please send by 4:30 pm. We have a lot to do, and I wish to avoid another all-nighter on Monday night.

With respect to the state court order, I called Judge Highberger's department and informed the judicial assistant that you and we are not available Friday morning in light of the PTC in this case. The judicial assistant informed me that he would get back to me.

Arash

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---

**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Sent:** Wednesday, July 30, 2025 9:16 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V.

<MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash:

We are duty bound to respond to the new objection material you added in this document, which it took you 24 hours to prepare. We are duty bound to respond and so have to further add information. We have a new deadline for the filing and we will meet it,

Mik

<image001.jpg>

<image001.jpg>

**Michael Murphy**

Partner

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<image001.jpg>

(310) 974-2271 (cell)

<image001.jpg>

[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 6:33 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H.

<[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Fox Rothschild Team,

Please advise re: status of the PTCO and joint jury instructions.

Please also advise when tomorrow or Friday you are available to meet and confer on all the pretrial docs.

Arash

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---

**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 3:12 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Counsel,

Please see the attached proposed final for review, which includes Defendants' portions addressing the new jury instructions, objections and proposals. We had to spend significant time reviewing changes we received to most if not all alternatively proposed instructions, as well as assess newly asserted objections to instructions and position statements. Please review. We will do a final review too, so we can get this on file as soon as possible.

Thank you,

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 1:36 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

To be clear, there were no "new" jury instructions in the document we circulated last night. As I mentioned in my prior emails, there was **one** jury instruction that I inserted into the draft but which was previously circulated to your office on Monday in a redline. This one jury instruction did not make it into the draft your office then circulated yesterday purporting to incorporate our edits from the Monday redline document.

Other than these, we made typographical and formatting corrections and inserted objections.

Best,  
Meeghan

[<image001.jpg>](#)

<image001.jpg>

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 1:14 PM

**To:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Tirtasaputra, Meeghan H.

<[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jessica,

We have been working to address your new jury instructions. We will send a response as soon as we can.

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---

**From:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 12:31 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jamison,



We're following up on Meeghan's email below. Can you please let us know when we can expect your response as we still need to file this and the PTC Order, in order to prepare the trial binder and deliver it to the court.

Thanks,

[<image001.jpg>](#)

<image001.jpg>

**Jessica Nwasike**

Associate

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[\(213\) 213-1213](tel:2132131213)

<image001.jpg>

[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, July 29, 2025 8:53 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V.

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**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

It seems there was only one instruction that did not make it into the one you circulated today, which is Instruction 4.5 Agent – Scope of Authority Defined.

I did not make any substantive changes to the instructions other than some typos here and there. Any additional words were made in redline. For example, I added the words “special instruction” before the title of the following instructions:

- Quantum Meruit – Defined (page 126)
- Quantum Meruit – Essential Elements (page 127)
- Misappropriation of Trade Secrets – Essential Factual Elements (page 128)
- Misappropriation of Trade Secrets – “Trade Secrets” Defined (page 129)
- Misappropriation of Trade Secrets – Secrecy Requirement (page 131)
- Misappropriation of Trade Secrets – Reasonable Efforts to Protect Secrecy (page 132)
- Misappropriation of Trade Secrets – Misappropriation by Use (page 134)
- Improper Means of Acquiring Trade Secret (page 135)

- Misappropriation of Trade Secrets – “Independent Economic Value” Explained (page 136)

There were also a couple of instructions that did not have any objections to which we added objections and added a space for you to add your objections / response. Those were highlighted for you.

I’ve attached the jury instructions again to the extent you didn’t receive the version with the redlines in them.

Best,  
Meeghan

[<image001.jpg>](#)

[<image001.jpg>](#)

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Tuesday, July 29, 2025 8:01 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V.

<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Meeghan,

Thank you for this. Please:

1. Identify the jury instructions you contend were missing.
2. Identify the jury instructions that were changed after receiving our substantive responses.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, July 29, 2025 6:55 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike,

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**Subject:** SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

All,

Attached is a draft proposed jury instructions with SPAVI's objections. There were one or two jury instructions from our redlined version circulated yesterday that did not make it into the one circulated by Blank Rome today, so I inserted those in redline. Also, the formatting throughout the document was very inconsistent and wonky in some places, so we unified the formatting to make the document consistent throughout. Any substantive changes to the jury instructions (not including Spavi's objections) were made in redline.

Please let us know if you have any questions or concerns.

Best,

Meeghan

<[image001.jpg](#)>

<[image001.jpg](#)>

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<[image001.jpg](#)>

[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

<[image001.jpg](#)>

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This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Fox Rothschild LLP by replying to this email and delete the original and reply emails. Thank you.

**From:** Beral, Arash  
**Sent:** Monday, August 4, 2025 1:14 PM  
**To:** Tirtasaputra, Meeghan H.  
**Cc:** Malynn, Todd M.; Schiraldi, Michael V.; Arjam, Farshid; Follett, Matthew; Murphy, Michael D.; Nwasike, Jessica; Gilmore, Jamison  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)  
**Attachments:** Proposed Verdict Form.docx; Proposed Jury Instructions.docx

Meeghan,

See attached. I went through the jury instructions one last time to try and eliminate objections on our end. I also edited the verdict form. Apportionment and comparative fault are not currently addressed in the verdict form. Would be pleased to hear how your side desires to handle that.

Regarding the form of the jury instructions, our team has reviewed and re-reviewed the Court's Order at Dkt. 30 and we believe that the Court expects the document of disputed and undisputed instructions to be combined into one document with objections, responses, and proposed alternatives all included within it by order of instruction. Otherwise, the "clean" set template's "page no." section wouldn't work (i.e., we can't identify two separate "page no. 1's" referencing different docs). It needs to be one document. So we've combined it, which took a lot of time. If you have questions on this, please call Jamison.

Arash

**Arash Beral** | BLANKROME

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[Arash Beral](#) | [Blank Rome LLP](#)

---

**From:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>

**Sent:** Monday, August 4, 2025 11:54 AM

**To:** Beral, Arash <arash.beral@blankrome.com>

**Cc:** Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <Farjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Understood. We will wait to get your revised verdict form.

I've attached a final pre trial conference order here for your review. We are reviewing your proposed joint statement of the case and have a few edits. We will revert to you shortly.

Best,  
Meeghan



---

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**From:** Beral, Arash <arash.beral@blankrome.com>

**Sent:** Monday, August 4, 2025 11:50 AM

**To:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>

**Cc:** Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan, I just noted a few mistakes in the verdict form in the sections relating to the PCJV party's claims against your clients. We're going to have another draft to you soon alongside the jury instructions. In the meantime, please send the other docs for our review.

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

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---

**From:** Beral, Arash

**Sent:** Monday, August 4, 2025 11:23 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

We are almost finished with our edits to the jury instructions. Suggest your team and our team get on a call to discuss them and determine if we could narrow disputes. We'll get those over to you very shortly. In the meantime, we took a crack at a new proposed joint statement of the case, intended to be as objective and neutral as possible. Please review. Please review the verdict form attached.

Arash

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 9:47 AM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Thanks, Arash. We should have the other docs to you shortly.

Best,  
Meeghan



---

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Senior Associate

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Los Angeles, CA 90067

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☐ (310) 556-9828

☐ [mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 9:45 AM



**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** [EXT] Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Almost ready. Where are you guys on the rest of the docs?

On Aug 4, 2025, at 8:44 AM, Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)> wrote:

Arash,

I'm following up on the verdict form and jury instructions we sent over on Friday. Please let us know when you'll be circulating those with your changes / additions.

Best,  
Meeghan

**Meeghan H. Tirtasaputra**

Senior Associate

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Suite 900

Los Angeles, CA 90067

Direct: (424) 285-7080

Fax: (310) 556-9828

[Bio](#) | [Email](#) | [Website](#)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 5:45 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

In accordance with the Court's Civil Pretrial and Trial Order (dkt. 30), we separated the jury instructions into joint, separate, and clean. Accordingly, attached are the following documents for your review:

1. Proposed joint jury instructions (containing the agreed upon jury instructions)
2. SPAVI's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
3. PCJV's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
4. Clean proposed jury instructions (containing only the agreed upon jury instructions for now but which will need to include the disputed once those are finalized) (made in accordance with the court's civil pretrial and trial order as well as the Court's clean jury instruction template on its website)
5. Revised verdict form

If you have any questions or concerns, please let us know.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**

Senior Associate

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☐ (310) 556-9828

☐ [mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 2:58 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>;

Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V.

<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>

**Subject:** Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

we have taken it upon ourselves to reformat all of these documents to make sure that they are compliant with the Court order particularly. You're not gonna get them today. You will get them likely at some point this weekend. My request is that you make sure that all of the objections and information and complaints and grievances that you have are stated in the current document so that we can make sure that they make in the properly formatted documents. We're not gonna be able to get into the endless cycle of objection counter

objection, and counter counter objection anymore. We have much more serious things to worry about. As soon as I have an update as to win, we will get you final documents to approve, I will let you know.

Highberger goes please do not communicate with his courtroom without copying me.

---

**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Friday, August 1, 2025 2:50:22 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Mike,

Following up. We need your materials to review over the weekend. Please send by 4:30 pm. We have a lot to do, and I wish to avoid another all-nighter on Monday night.

With respect to the state court order, I called Judge Highberger's department and informed the judicial assistant that you and we are not available Friday morning in light of the PTC in this case. The judicial assistant informed me that he would get back to me.

Arash

**Arash Beral** | BLANKROME  
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[Arash Beral | Blank Rome LLP](#)

---

**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Sent:** Wednesday, July 30, 2025 9:16 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash:

We are duty bound to respond to the new objection material you added in this document, which it took you 24 hours to prepare. We are duty bound to respond and so have to further add information. We have a new deadline for the filing and we will meet it,

Mik

[<image001.jpg>](#)

[<image001.jpg>](#)

**Michael Murphy**

Partner

[<image001.jpg>](#)

(213) 213-1211

[<image001.jpg>](#)

(310) 974-2271 (cell)

[<image001.jpg>](#)

mdmurphy@foxrothschild.com

[<image001.jpg>](#)

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 6:33 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H.

<[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Fox Rothschild Team,

Please advise re: status of the PTCO and joint jury instructions.

Please also advise when tomorrow or Friday you are available to meet and confer on all the pretrial docs.

Arash

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---

**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 3:12 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica

<[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Counsel,

Please see the attached proposed final for review, which includes Defendants' portions addressing the new jury instructions, objections and proposals. We had to spend significant time reviewing changes we received to most if not all alternatively proposed instructions, as well as assess newly asserted objections to instructions and position statements. Please review. We will do a final review too, so we can get this on file as soon as possible.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 1:36 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Nwasike, Jessica

<[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

To be clear, there were no "new" jury instructions in the document we circulated last night. As I mentioned in my prior emails, there was **one** jury instruction that I inserted into the draft but which was previously circulated to your office on Monday in a redline. This one jury instruction did not make it into the draft your office then circulated yesterday purporting to incorporate our edits from the Monday redline document.

Other than these, we made typographical and formatting corrections and inserted objections.

Best,  
Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

<image001.jpg>

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 1:14 PM

**To:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Tirtasaputra, Meeghan H.

<[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jessica,

We have been working to address your new jury instructions. We will send a response as soon as we can.

**Jamison T. Gilmore** | BLANKROME

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---

**From:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 12:31 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jamison,

We're following up on Meeghan's email below. Can you please let us know when we can expect your response as we still need to file this and the PTC Order, in order to prepare the trial binder and deliver it to the court.

Thanks,

[<image001.jpg>](#)

<image001.jpg>

**Jessica Nwasike**

Associate

10250 Constellation Boulevard  
Suite 900  
Los Angeles, CA 90067

<image001.jpg>

(213) 213-1213

<image001.jpg>

[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)

<image001.jpg>

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, July 29, 2025 8:53 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V.

<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

It seems there was only one instruction that did not make it into the one you circulated today, which is Instruction 4.5 Agent – Scope of Authority Defined.

I did not make any substantive changes to the instructions other than some typos here and there. Any additional words were made in redline. For example, I added the words “special instruction” before the title of the following instructions:

- Quantum Meruit – Defined (page 126)
- Quantum Meruit – Essential Elements (page 127)
- Misappropriation of Trade Secrets – Essential Factual Elements (page 128)
- Misappropriation of Trade Secrets – “Trade Secrets” Defined (page 129)
- Misappropriation of Trade Secrets – Secrecy Requirement (page 131)
- Misappropriation of Trade Secrets – Reasonable Efforts to Protect Secrecy (page 132)
- Misappropriation of Trade Secrets – Misappropriation by Use (page 134)
- Improper Means of Acquiring Trade Secret (page 135)
- Misappropriation of Trade Secrets – “Independent Economic Value” Explained (page 136)

There were also a couple of instructions that did not have any objections to which we added objections and added a space for you to add your objections / response. Those were highlighted for you.

I’ve attached the jury instructions again to the extent you didn’t receive the version with the redlines in them.

Best,  
Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

Senior Associate

10250 Constellation Boulevard

Suite 900

Los Angeles, CA 90067

<image001.jpg>

(424) 285-7080

<image001.jpg>

(310) 556-9828

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

<image001.jpg>

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Tuesday, July 29, 2025 8:01 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash  
<[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V.

<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Meeghan,

Thank you for this. Please:

1. Identify the jury instructions you contend were missing.
2. Identify the jury instructions that were changed after receiving our substantive responses.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, July 29, 2025 6:55 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike,

Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam,

Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)



All,

Attached is a draft proposed jury instructions with SPAVI's objections. There were one or two jury instructions from our redlined version circulated yesterday that did not make it into the one circulated by Blank Rome today, so I inserted those in redline. Also, the formatting throughout the document was very inconsistent and wonky in some places, so we unified the formatting to make the document consistent throughout. Any substantive changes to the jury instructions (not including Spavi's objections) were made in redline.

Please let us know if you have any questions or concerns.

Best,  
Meeghan

[<image001.jpg>](#)

[<image001.jpg>](#)

**Meeghan H Tirtasaputra**

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[<image001.jpg>](#)

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This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Fox Rothschild LLP by replying to this email and delete the original and reply emails. Thank you.

**From:** Beral, Arash  
**Sent:** Monday, August 4, 2025 2:20 PM  
**To:** Tirtasaputra, Meeghan H.  
**Cc:** Malynn, Todd M.; Schiraldi, Michael V.; Arjam, Farshid; Follett, Matthew; Murphy, Michael D.; Nwasike, Jessica; Gilmore, Jamison  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)  
**Attachments:** Proposed PTC Order.docx

Meeghan,

Here is the PTC Order. I propose that we further mutually reduce the amount of objections to each side's exhibits. I'm prepared to entirely remove our objections to your exhs. 1, 2, 10, 13-19, 30, 33-35, 57, 74, 76, 78, 80, 83-89, and 98-103 and remove objections, in part, to your exhs. 4, 6, 72, 104. I request that you reciprocate by removing all of your relevance and hearsay objections, unless there truly is a need to contest relevance or hearsay. Please note that nearly all of our exhibits comprise docs and communications between the relevant Cinco Group and LA Group parties and their agents/affiliates. I have a hard time believing that any of these are not relevant or constitute hearsay (especially when your side is also relying on docs and communications between these parties). I've revised the PTC Order to eliminate objections with the belief that your side will reciprocate in good faith.

Thank you.

Arash

**Arash Beral** | BLANKROME  
2029 Century Park East, Los Angeles, CA 90067  
[Arash Beral](#) | [Blank Rome LLP](#)

---

**From:** Beral, Arash  
**Sent:** Monday, August 4, 2025 1:14 PM  
**To:** 'Tirtasaputra, Meeghan H.' <MTirtasaputra@foxrothschild.com>  
**Cc:** Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <Farjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

See attached. I went through the jury instructions one last time to try and eliminate objections on our end. I also edited the verdict form. Apportionment and comparative fault are not currently addressed in the verdict form. Would be pleased to hear how your side desires to handle that.

Regarding the form of the jury instructions, our team has reviewed and re-reviewed the Court's Order at Dkt. 30 and we believe that the Court expects the document of disputed and undisputed instructions to be combined into one document with objections, responses, and proposed alternatives all included within it by order of instruction. Otherwise, the "clean" set template's "page no." section wouldn't work (i.e., we can't identify two separate "page no. 1's" referencing different docs). It needs to be one document. So we've combined it, which took a lot of time. If you have questions on this, please call Jamison.

Arash

**Arash Beral** | BLANKROME

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 11:54 AM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Understood. We will wait to get your revised verdict form.

I've attached a final pre trial conference order here for your review. We are reviewing your proposed joint statement of the case and have a few edits. We will revert to you shortly.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**  
Senior Associate

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Los Angeles, CA 90067

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 11:50 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan, I just noted a few mistakes in the verdict form in the sections relating to the PCJV party's claims against your clients. We're going to have another draft to you soon alongside the jury instructions. In the meantime, please send the other docs for our review.

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

---

**From:** Beral, Arash

**Sent:** Monday, August 4, 2025 11:23 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

We are almost finished with our edits to the jury instructions. Suggest your team and our team get on a call to discuss them and determine if we could narrow disputes. We'll get those over to you very shortly. In the meantime, we took a crack at a new proposed joint statement of the case, intended to be as objective and neutral as possible. Please review. Please review the verdict form attached.

Arash

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Monday, August 4, 2025 9:47 AM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Thanks, Arash. We should have the other docs to you shortly.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**  
Senior Associate

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Monday, August 4, 2025 9:45 AM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** [EXT] Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Almost ready. Where are you guys on the rest of the docs?

On Aug 4, 2025, at 8:44 AM, Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)> wrote:

Arash,

I'm following up on the verdict form and jury instructions we sent over on Friday. Please let us know when you'll be circulating those with your changes / additions.

Best,  
Meeghan

**Meeghan H. Tirtasaputra**

Senior Associate

**Fox Rothschild LLP**

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Suite 900

Los Angeles, CA 90067

Direct: (424) 285-7080

Fax: (310) 556-9828

[Bio](#) | [Email](#) | [Website](#)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 5:45 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

In accordance with the Court's Civil Pretrial and Trial Order (dkt. 30), we separated the jury instructions into joint, separate, and clean. Accordingly, attached are the following documents for your review:

1. Proposed joint jury instructions (containing the agreed upon jury instructions)
2. SPAVI's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
3. PCJV's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
4. Clean proposed jury instructions (containing only the agreed upon jury instructions for now but which will need to include the disputed once those are finalized) (made in accordance with the court's civil pretrial and trial order as well as the Court's clean jury instruction template on its website)
5. Revised verdict form

If you have any questions or concerns, please let us know.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra****Senior Associate**

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Los Angeles, CA 90067

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 2:58 PM**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>;Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V.<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>**Subject:** Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

we have taken it upon ourselves to reformat all of these documents to make sure that they are compliant with the Court order particularly. You're not gonna get them today. You will get them likely at some point this weekend. My request is that you make sure that all of the objections and information and complaints and grievances that you have are stated in the current document so that we can make sure that they make in the properly formatted documents. We're not gonna be able to get into the endless cycle of objection counter objection, and counter counter objection anymore. We have much more serious things to worry about. As soon as I have an update as to win, we will get you final documents to approve, I will let you know.

Highberger goes please do not communicate with his courtroom without copying me.

---

**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Friday, August 1, 2025 2:50:22 PM**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Gilmore, Jamison<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>;Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V.<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)



Mike,

Following up. We need your materials to review over the weekend. Please send by 4:30 pm. We have a lot to do, and I wish to avoid another all-nighter on Monday night.

With respect to the state court order, I called Judge Highberger's department and informed the judicial assistant that you and we are not available Friday morning in light of the PTC in this case. The judicial assistant informed me that he would get back to me.

Arash

**Arash Beral | BLANKROME**

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

---

**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 9:16 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash:

We are duty bound to respond to the new objection material you added in this document, which it took you 24 hours to prepare. We are duty bound to respond and so have to further add information. We have a new deadline for the filing and we will meet it,

Mik

<[image001.jpg](#)>

<[image001.jpg](#)>

**Michael Murphy**

Partner

<[image001.jpg](#)>

(213) 213-1211

<[image001.jpg](#)>

(310) 974-2271 (cell)

<[image001.jpg](#)>

[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

<image001.jpg>

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 6:33 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Fox Rothschild Team,

Please advise re: status of the PTCO and joint jury instructions.

Please also advise when tomorrow or Friday you are available to meet and confer on all the pretrial docs.

Arash

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

---

**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 3:12 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Counsel,

Please see the attached proposed final for review, which includes Defendants' portions addressing the new jury instructions, objections and proposals. We had to spend significant time reviewing changes we received to most if not all alternatively proposed instructions, as well as assess newly asserted objections to instructions and position statements. Please review. We will do a final review too, so we can get this on file as soon as possible.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Wednesday, July 30, 2025 1:36 PM  
**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

To be clear, there were no “new” jury instructions in the document we circulated last night. As I mentioned in my prior emails, there was **one** jury instruction that I inserted into the draft but which was previously circulated to your office on Monday in a redline. This one jury instruction did not make it into the draft your office then circulated yesterday purporting to incorporate our edits from the Monday redline document.

Other than these, we made typographical and formatting corrections and inserted objections.

Best,  
Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

Senior Associate

10250 Constellation Boulevard

Suite 900

Los Angeles, CA 90067

<image001.jpg>

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

<image001.jpg>

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Wednesday, July 30, 2025 1:14 PM  
**To:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<FArjam@foxrothschild.com>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jessica,

We have been working to address your new jury instructions. We will send a response as soon as we can.

**Jamison T. Gilmore** | BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

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---

**From:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 12:31 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<FArjam@foxrothschild.com>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jamison,

We're following up on Meeghan's email below. Can you please let us know when we can expect your response as we still need to file this and the PTC Order, in order to prepare the trial binder and deliver it to the court.

Thanks,

<[image001.jpg](#)>

<[image001.jpg](#)>

**Jessica Nwasike**

Associate

10250 Constellation Boulevard

Suite 900

Los Angeles, CA 90067

<[image001.jpg](#)>

(213) 213-1213

<[image001.jpg](#)>

[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)

<[image001.jpg](#)>

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, July 29, 2025 8:53 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V.

<MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>; Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

It seems there was only one instruction that did not make it into the one you circulated today, which is Instruction 4.5 Agent – Scope of Authority Defined.

I did not make any substantive changes to the instructions other than some typos here and there. Any additional words were made in redline. For example, I added the words “special instruction” before the title of the following instructions:

- Quantum Meruit – Defined (page 126)
- Quantum Meruit – Essential Elements (page 127)
- Misappropriation of Trade Secrets – Essential Factual Elements (page 128)
- Misappropriation of Trade Secrets – “Trade Secrets” Defined (page 129)
- Misappropriation of Trade Secrets – Secrecy Requirement (page 131)
- Misappropriation of Trade Secrets – Reasonable Efforts to Protect Secrecy (page 132)
- Misappropriation of Trade Secrets – Misappropriation by Use (page 134)
- Improper Means of Acquiring Trade Secret (page 135)
- Misappropriation of Trade Secrets – “Independent Economic Value” Explained (page 136)

There were also a couple of instructions that did not have any objections to which we added objections and added a space for you to add your objections / response. Those were highlighted for you.

I’ve attached the jury instructions again to the extent you didn’t receive the version with the redlines in them.

Best,  
Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

Senior Associate

10250 Constellation Boulevard

Suite 900

Los Angeles, CA 90067

<image001.jpg>

(424) 285-7080

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

<image001.jpg>

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Tuesday, July 29, 2025 8:01 PM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Meeghan,

Thank you for this. Please:

1. Identify the jury instructions you contend were missing.
2. Identify the jury instructions that were changed after receiving our substantive responses.

Thank you,

**Jamison T. Gilmore** | BLANKROME  
2029 Century Park East | 6th Floor | Los Angeles, CA 90067  
+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Tuesday, July 29, 2025 6:55 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

All,

Attached is a draft proposed jury instructions with SPAVI's objections. There were one or two jury instructions from our redlined version circulated yesterday that did not make it into the one circulated by Blank Rome today, so I inserted those in redline. Also, the formatting throughout the document was very inconsistent and wonky in some places, so we unified the formatting to make the document consistent throughout. Any substantive changes to the jury instructions (not including Spavi's objections) were made in redline.

Please let us know if you have any questions or concerns.

Best,

Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

Senior Associate

10250 Constellation Boulevard

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**From:** Beral, Arash  
**Sent:** Monday, August 4, 2025 3:17 PM  
**To:** Tirtasaputra, Meeghan H.  
**Cc:** Malynn, Todd M.; Schiraldi, Michael V.; Arjam, Farshid; Follett, Matthew; Murphy, Michael D.; Nwasike, Jessica; Gilmore, Jamison  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Meeghan,

Let's go with your proposal 1 (insert your footnote). We are prepared to talk. Please circulate an invite at your convenience.

Arash

**Arash Beral** | BLANKROME  
2029 Century Park East, Los Angeles, CA 90067  
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---

**From:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>  
**Sent:** Monday, August 4, 2025 3:04 PM  
**To:** Beral, Arash <arash.beral@blankrome.com>  
**Cc:** Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <Farjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

I read his instructions to mean that legal citations should be included in the supporting or opposing paragraphs. The court's order states, with regard to disputed instructions, that the proposed instruction should include the proposed instruction, a one paragraph statement in support of the instruction with legal citations, a one paragraph statement in opposition to the instruction with legal citations, and any proposed alternative instruction. Further, the authority or source of the instructions would just be the Ninth Circuit Model Civil Jury Instructions, CACI, or, if a special, case law and other sources. The "in full" reference seemingly goes to just the instruction and not to include the instruction's own sources and comments.

As I mentioned previously, we are opposed to including the comments in the jury instructions. If you disagree, we can either (1) include a footnote on behalf of plaintiffs stating we do not believe including the comments to instructions comports with the Court's rules or (2) you can incorporate the comments into your paragraph of support of opposition to each instruction.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**

Senior Associate

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**From:** Beral, Arash <arash.beral@blankrome.com>

**Sent:** Monday, August 4, 2025 2:46 PM

**To:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>

**Cc:** Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <Farjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

The Court's Order at Dkt. 30 (page 8) says that each requested instruction must "cite the authority or source of the instructions" and be "set forth in full," but also that "and any relevant case citations" be included in the index. We added the comments back in to try not to only be fully compliant in case we are reading the Court's Order to include the model instructions comments, but also for ease of you preparing the index which we read to mean must include "relevant case citations." I, too, have not included model instruction comments in the past, but it's unclear to me whether the Court expects it to be done here.

Arash

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 2:33 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

On a preliminary review of the jury instructions you sent over, I see that you added the comments back into some of the jury instructions. I have not seen that done in my experience as the Court does not read them as part of the jury instructions. To the extent the Court wants to see comments, he can simply go to the source we cite and review them independently. The Court's order simply asks for the authority or source, which are already in there. We don't believe that including the comments comport with the Court's rules and propose that we take all comments out of the jury instructions. To the extent the comments are something you are proposing, that is more properly included in your supporting paragraph for each instruction, i.e., "PCJV USA Parties' Objection / Position."

Best,  
Meeghan



---

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 2:21 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Received. I've attached the joint statement of the case with our redline changes. I'm also available after 3:30 today to discuss the jury instructions. Let me know.

Best,  
Meeghan



---

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Monday, August 4, 2025 1:14 PM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

See attached. I went through the jury instructions one last time to try and eliminate objections on our end. I also edited the verdict form. Apportionment and comparative fault are not currently addressed in the verdict form. Would be pleased to hear how your side desires to handle that.

Regarding the form of the jury instructions, our team has reviewed and re-reviewed the Court's Order at Dkt. 30 and we believe that the Court expects the document of disputed and undisputed instructions to be combined into one document with objections, responses, and proposed alternatives all included within it by order of instruction. Otherwise, the "clean" set template's "page no." section wouldn't work (i.e., we can't identify two separate "page no. 1's" referencing different docs). It needs to be one document. So we've combined it, which took a lot of time. If you have questions on this, please call Jamison.

Arash

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 11:54 AM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Understood. We will wait to get your revised verdict form.

I've attached a final pre trial conference order here for your review. We are reviewing your proposed joint statement of the case and have a few edits. We will revert to you shortly.

Best,  
Meeghan



---

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 11:50 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan, I just noted a few mistakes in the verdict form in the sections relating to the PCJV party's claims against your clients. We're going to have another draft to you soon alongside the jury instructions. In the meantime, please send the other docs for our review.

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---

**From:** Beral, Arash

**Sent:** Monday, August 4, 2025 11:23 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

We are almost finished with our edits to the jury instructions. Suggest your team and our team get on a call to discuss them and determine if we could narrow disputes. We'll get those over to you very shortly. In the meantime, we took a crack at a new proposed joint statement of the case, intended to be as objective and neutral as possible. Please review. Please review the verdict form attached.

Arash

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 9:47 AM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Thanks, Arash. We should have the other docs to you shortly.

Best,  
Meeghan



---

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 9:45 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** [EXT] Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Almost ready. Where are you guys on the rest of the docs?

On Aug 4, 2025, at 8:44 AM, Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)> wrote:

Arash,

I'm following up on the verdict form and jury instructions we sent over on Friday. Please let us know when you'll be circulating those with your changes / additions.

Best,  
Meeghan

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Friday, August 1, 2025 5:45 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

In accordance with the Court's Civil Pretrial and Trial Order (dkt. 30), we separated the jury instructions into joint, separate, and clean. Accordingly, attached are the following documents for your review:

1. Proposed joint jury instructions (containing the agreed upon jury instructions)
2. SPAVI's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
3. PCJV's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
4. Clean proposed jury instructions (containing only the agreed upon jury instructions for now but which will need to include the disputed once those are finalized) (made in accordance with the court's civil pretrial and trial order as well as the Court's clean jury instruction template on its website)
5. Revised verdict form

If you have any questions or concerns, please let us know.

Best,  
Meeghan



---

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Sent:** Friday, August 1, 2025 2:58 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>  
**Subject:** Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

we have taken it upon ourselves to reformat all of these documents to make sure that they are compliant with the Court order particularly. You're not gonna get them today. You will get them likely at some point this weekend. My request is that you make sure that all of the objections and information and complaints and grievances that you have are stated in the current document so that we can make sure that they make in the properly formatted documents. We're not gonna be able to get into the endless cycle of objection counter objection, and counter counter objection anymore. We have much more serious things to worry about. As soon as I have an update as to win, we will get you final documents to approve, I will let you know.

Highberger goes please do not communicate with his courtroom without copying me.

---

**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Friday, August 1, 2025 2:50:22 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Mike,

Following up. We need your materials to review over the weekend. Please send by 4:30 pm. We have a lot to do, and I wish to avoid another all-nighter on Monday night.

With respect to the state court order, I called Judge Highberger's department and informed the judicial assistant that you and we are not available Friday morning in light of the PTC in this case. The judicial assistant informed me that he would get back to me.

Arash

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 9:16 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash:

We are duty bound to respond to the new objection material you added in this document, which it took you 24 hours to prepare. We are duty bound to respond and so have to further add information. We have a new deadline for the filing and we will meet it,

Mik

<[image001.jpg](#)>

<[image001.jpg](#)>

**Michael Murphy**

Partner

<[image001.jpg](#)>

(213) 213-1211

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(310) 974-2271 (cell)

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 6:33 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<FArjam@foxrothschild.com>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Fox Rothschild Team,

Please advise re: status of the PTCO and joint jury instructions.

Please also advise when tomorrow or Friday you are available to meet and confer on all the pretrial docs.

Arash

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 3:12 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Counsel,

Please see the attached proposed final for review, which includes Defendants' portions addressing the new jury instructions, objections and proposals. We had to spend significant time reviewing changes we received to most if not all alternatively proposed instructions, as well as assess newly asserted objections to instructions and position statements. Please review. We will do a final review too, so we can get this on file as soon as possible.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 1:36 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

To be clear, there were no “new” jury instructions in the document we circulated last night. As I mentioned in my prior emails, there was **one** jury instruction that I inserted into the draft but which was previously circulated to your office on Monday in a redline. This one jury instruction did not make it into the draft your office then circulated yesterday purporting to incorporate our edits from the Monday redline document.

Other than these, we made typographical and formatting corrections and inserted objections.

Best,  
Meeghan

[<image001.jpg>](#)

[<image001.jpg>](#)

**Meeghan H Tirtasaputra**

Senior Associate

10250 Constellation Boulevard

Suite 900

Los Angeles, CA 90067

[<image001.jpg>](#)

[\(424\) 285-7080](#)

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[\(310\) 556-9828](#)

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

[<image001.jpg>](#)

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 1:14 PM

**To:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Tirtasaputra, Meeghan H.

<[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jessica,

We have been working to address your new jury instructions. We will send a response as soon as we can.

**Jamison T. Gilmore** | BLANKROME

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+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

**From:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Sent:** Wednesday, July 30, 2025 12:31 PM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jamison,

We're following up on Meeghan's email below. Can you please let us know when we can expect your response as we still need to file this and the PTC Order, in order to prepare the trial binder and deliver it to the court.

Thanks,

[<image001.jpg>](#)

<image001.jpg>

**Jessica Nwasike**

Associate

10250 Constellation Boulevard

Suite 900

Los Angeles, CA 90067

<image001.jpg>

(213) 213-1213

<image001.jpg>

[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)

<image001.jpg>

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Tuesday, July 29, 2025 8:53 PM  
**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

It seems there was only one instruction that did not make it into the one you circulated today, which is Instruction 4.5 Agent – Scope of Authority Defined.

I did not make any substantive changes to the instructions other than some typos here and there. Any additional words were made in redline. For example, I added the words “special instruction” before the title of the following instructions:

- Quantum Meruit – Defined (page 126)
- Quantum Meruit – Essential Elements (page 127)
- Misappropriation of Trade Secrets – Essential Factual Elements (page 128)
- Misappropriation of Trade Secrets – “Trade Secrets” Defined (page 129)
- Misappropriation of Trade Secrets – Secrecy Requirement (page 131)
- Misappropriation of Trade Secrets – Reasonable Efforts to Protect Secrecy (page 132)
- Misappropriation of Trade Secrets – Misappropriation by Use (page 134)
- Improper Means of Acquiring Trade Secret (page 135)
- Misappropriation of Trade Secrets – “Independent Economic Value” Explained (page 136)

There were also a couple of instructions that did not have any objections to which we added objections and added a space for you to add your objections / response. Those were highlighted for you.

I’ve attached the jury instructions again to the extent you didn’t receive the version with the redlines in them.

Best,  
Meeghan

[<image001.jpg>](#)

[<image001.jpg>](#)

**Meeghan H Tirtasaputra**

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

[<image001.jpg>](#)

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Tuesday, July 29, 2025 8:01 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V.

<MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Meeghan,

Thank you for this. Please:

1. Identify the jury instructions you contend were missing.
2. Identify the jury instructions that were changed after receiving our substantive responses.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, July 29, 2025 6:55 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike,

Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam,

Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

All,

Attached is a draft proposed jury instructions with SPAVI's objections. There were one or two jury instructions from our redlined version circulated yesterday that did not make it into the one circulated by Blank Rome today, so I inserted those in redline. Also, the formatting throughout the document was very inconsistent and wonky in some places, so we unified the formatting to make the document consistent throughout. Any substantive changes to the jury instructions (not including Spavi's objections) were made in redline.

Please let us know if you have any questions or concerns.

Best,

Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

Senior Associate

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**From:** Beral, Arash  
**Sent:** Monday, August 4, 2025 3:23 PM  
**To:** Tirtasaputra, Meeghan H.  
**Cc:** Malynn, Todd M.; Schiraldi, Michael V.; Arjam, Farshid; Follett, Matthew; Murphy, Michael D.; Nwasike, Jessica; Gilmore, Jamison  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

We are fine with your proposed edits to the joint statement of the case and suggest we file it today.

Arash

**Arash Beral** | BLANKROME  
2029 Century Park East, Los Angeles, CA 90067  
[Arash Beral | Blank Rome LLP](#)

---

**From:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>  
**Sent:** Monday, August 4, 2025 2:21 PM  
**To:** Beral, Arash <arash.beral@blankrome.com>  
**Cc:** Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Received. I've attached the joint statement of the case with our redline changes. I'm also available after 3:30 today to discuss the jury instructions. Let me know.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**  
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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 1:14 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

See attached. I went through the jury instructions one last time to try and eliminate objections on our end. I also edited the verdict form. Apportionment and comparative fault are not currently addressed in the verdict form. Would be pleased to hear how your side desires to handle that.

Regarding the form of the jury instructions, our team has reviewed and re-reviewed the Court's Order at Dkt. 30 and we believe that the Court expects the document of disputed and undisputed instructions to be combined into one document with objections, responses, and proposed alternatives all included within it by order of instruction. Otherwise, the "clean" set template's "page no." section wouldn't work (i.e., we can't identify two separate "page no. 1's" referencing different docs). It needs to be one document. So we've combined it, which took a lot of time. If you have questions on this, please call Jamison.

Arash

**Arash Beral** | BLANKROME

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 11:54 AM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Understood. We will wait to get your revised verdict form.

I've attached a final pre trial conference order here for your review. We are reviewing your proposed joint statement of the case and have a few edits. We will revert to you shortly.

Best,  
Meeghan



---

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Senior Associate

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 11:50 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan, I just noted a few mistakes in the verdict form in the sections relating to the PCJV party's claims against your clients. We're going to have another draft to you soon alongside the jury instructions. In the meantime, please send the other docs for our review.

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

**From:** Beral, Arash

**Sent:** Monday, August 4, 2025 11:23 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

We are almost finished with our edits to the jury instructions. Suggest your team and our team get on a call to discuss them and determine if we could narrow disputes. We'll get those over to you very shortly. In the meantime, we took a crack at a new proposed joint statement of the case, intended to be as objective and neutral as possible. Please review. Please review the verdict form attached.

Arash

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 9:47 AM

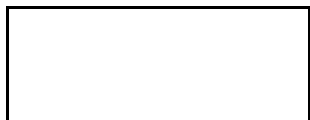
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Thanks, Arash. We should have the other docs to you shortly.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**  
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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 9:45 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** [EXT] Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Almost ready. Where are you guys on the rest of the docs?

On Aug 4, 2025, at 8:44 AM, Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)> wrote:

Arash,

I'm following up on the verdict form and jury instructions we sent over on Friday. Please let us know when you'll be circulating those with your changes / additions.

Best,  
Meeghan

**Meeghan H. Tirtasaputra**

Senior Associate

**Fox Rothschild LLP**

10250 Constellation Blvd.

Suite 900

Los Angeles, CA 90067

Direct: (424) 285-7080

Fax: (310) 556-9828

[Bio](#) | [Email](#) | [Website](#)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 5:45 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore,

Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H.

<[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

In accordance with the Court's Civil Pretrial and Trial Order (dkt. 30), we separated the jury instructions into joint, separate, and clean. Accordingly, attached are the following documents for your review:

1. Proposed joint jury instructions (containing the agreed upon jury instructions)
2. SPAVI's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
3. PCJV's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
4. Clean proposed jury instructions (containing only the agreed upon jury instructions for now but which will need to include the disputed once those are finalized) (made in accordance with the court's civil pretrial and trial order as well as the Court's clean jury instruction template on its website)
5. Revised verdict form

If you have any questions or concerns, please let us know.

Best,

Meeghan



---

**Meeghan H Tirtasaputra**

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 2:58 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>;

Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

we have taken it upon ourselves to reformat all of these documents to make sure that they are compliant with the Court order particularly. You're not gonna get them today. You will get them likely at some point this weekend. My request is that you make sure that all of the objections and information and complaints and grievances that you have are stated in the current document so that we can make sure that they make in the properly formatted documents. We're not gonna be able to get into the endless cycle of objection counter objection, and counter counter objection anymore. We have much more serious things to worry about. As soon as I have an update as to win, we will get you final documents to approve, I will let you know.

Highberger goes please do not communicate with his courtroom without copying me.

---

**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Friday, August 1, 2025 2:50:22 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Mike,

Following up. We need your materials to review over the weekend. Please send by 4:30 pm. We have a lot to do, and I wish to avoid another all-nighter on Monday night.

With respect to the state court order, I called Judge Highberger's department and informed the judicial assistant that you and we are not available Friday morning in light of the PTC in this case. The judicial assistant informed me that he would get back to me.

Arash

**Arash Beral** | BLANKROME  
2029 Century Park East, Los Angeles, CA 90067  
[Arash Beral | Blank Rome LLP](#)

---

**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Sent:** Wednesday, July 30, 2025 9:16 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)



Arash:

We are duty bound to respond to the new objection material you added in this document, which it took you 24 hours to prepare. We are duty bound to respond and so have to further add information. We have a new deadline for the filing and we will meet it,

Mik

[<image001.jpg>](#)

[<image001.jpg>](#)

**Michael Murphy**

Partner

[<image001.jpg>](#)

[\(213\) 213-1211](#)

[<image001.jpg>](#)

[\(310\) 974-2271 \(cell\)](#)

[<image001.jpg>](#)

[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

[<image001.jpg>](#)

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 6:33 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Fox Rothschild Team,

Please advise re: status of the PTCO and joint jury instructions.

Please also advise when tomorrow or Friday you are available to meet and confer on all the pretrial docs.

Arash

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

---

**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Wednesday, July 30, 2025 3:12 PM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Counsel,

Please see the attached proposed final for review, which includes Defendants' portions addressing the new jury instructions, objections and proposals. We had to spend significant time reviewing changes we received to most if not all alternatively proposed instructions, as well as assess newly asserted objections to instructions and position statements. Please review. We will do a final review too, so we can get this on file as soon as possible.

Thank you,

**Jamison T. Gilmore** | BLANKROME  
2029 Century Park East | 6th Floor | Los Angeles, CA 90067  
+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Wednesday, July 30, 2025 1:36 PM  
**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

To be clear, there were no "new" jury instructions in the document we circulated last night. As I mentioned in my prior emails, there was **one** jury instruction that I inserted into the draft but which was previously circulated to your office on Monday in a redline. This one jury instruction did not make it into the draft your office then circulated yesterday purporting to incorporate our edits from the Monday redline document.

Other than these, we made typographical and formatting corrections and inserted objections.

Best,  
Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

Senior Associate

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

<image001.jpg>

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 1:14 PM

**To:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Tirtasaputra, Meeghan H.

<[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jessica,

We have been working to address your new jury instructions. We will send a response as soon as we can.

**Jamison T. Gilmore** | BLANKROME

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---

**From:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 12:31 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid

<[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jamison,

We're following up on Meeghan's email below. Can you please let us know when we can expect your response as we still need to file this and the PTC Order, in order to prepare the trial binder and deliver it to the court.

Thanks,

[<image001.jpg>](#)

<image001.jpg>

**Jessica Nwasike**

Associate

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Los Angeles, CA 90067

<image001.jpg>

[\(213\) 213-1213](tel:(213)213-1213)

<image001.jpg>

[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)

<image001.jpg>

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, July 29, 2025 8:53 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V.

<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan

H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

It seems there was only one instruction that did not make it into the one you circulated today, which is Instruction 4.5 Agent – Scope of Authority Defined.

I did not make any substantive changes to the instructions other than some typos here and there. Any additional words were made in redline. For example, I added the words “special instruction” before the title of the following instructions:

- Quantum Meruit – Defined (page 126)
- Quantum Meruit – Essential Elements (page 127)
- Misappropriation of Trade Secrets – Essential Factual Elements (page 128)
- Misappropriation of Trade Secrets – “Trade Secrets” Defined (page 129)
- Misappropriation of Trade Secrets – Secrecy Requirement (page 131)
- Misappropriation of Trade Secrets – Reasonable Efforts to Protect Secrecy (page 132)
- Misappropriation of Trade Secrets – Misappropriation by Use (page 134)
- Improper Means of Acquiring Trade Secret (page 135)
- Misappropriation of Trade Secrets – “Independent Economic Value” Explained (page 136)

There were also a couple of instructions that did not have any objections to which we added objections and added a space for you to add your objections / response. Those were highlighted for you.

I've attached the jury instructions again to the extent you didn't receive the version with the redlines in them.

Best,  
Meeghan

[<image001.jpg>](#)

<image001.jpg>

**Meeghan H Tirtasaputra**

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Tuesday, July 29, 2025 8:01 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash  
<[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D.

<[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V.

<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Meeghan,

Thank you for this. Please:

1. Identify the jury instructions you contend were missing.
2. Identify the jury instructions that were changed after receiving our substantive responses.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, July 29, 2025 6:55 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike,

Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam,

Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

All,

Attached is a draft proposed jury instructions with SPAVI's objections. There were one or two jury instructions from our redlined version circulated yesterday that did not make it into the one circulated by Blank Rome today, so I inserted those in redline. Also, the formatting throughout the document was very inconsistent and wonky in some places, so we unified the formatting to make the document consistent throughout. Any substantive changes to the jury instructions (not including Spavi's objections) were made in redline.

Please let us know if you have any questions or concerns.

Best,

Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

Senior Associate

10250 Constellation Boulevard

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

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**From:** Beral, Arash  
**Sent:** Tuesday, August 5, 2025 8:47 AM  
**To:** Tirtasaputra, Meeghan H.; Malynn, Todd M.  
**Cc:** Schiraldi, Michael V.; Arjam, Farshid; Follett, Matthew; Murphy, Michael D.; Nwasike, Jessica; Gilmore, Jamison  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

14 min to go before 9 am. Don't think there's enough time for another round of review. Please file. Insert Todd's or mine's. Doesn't matter. Thanks for handling.

**Arash Beral** | BLANKROME  
2029 Century Park East, Los Angeles, CA 90067  
[Arash Beral](#) | [Blank Rome LLP](#)

---

**From:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>  
**Sent:** Tuesday, August 5, 2025 8:45 AM  
**To:** Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>  
**Cc:** Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Yes. Re jury instructions: we accepted all your requested changes (including mitigation instruction), numbered the jury instructions, and finishing the index as we speak. We will send to you to have eyes on it, but we will need to file immediately. Whose signature should I add for jury instructions?

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**  
Senior Associate

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☐ (424) 285-7080  
☐ (310) 556-9828  
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**From:** Beral, Arash <arash.beral@blankrome.com>

**Sent:** Tuesday, August 5, 2025 8:43 AM

**To:** Tirtasaputra, Meeghan H. <MTirtasaputra@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>

**Cc:** Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

You should have everything you need from us at this point, yes?

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

---

**From:** Beral, Arash

**Sent:** Tuesday, August 5, 2025 8:42 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Yes.

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, August 5, 2025 8:41 AM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Accepted your changes in verdict form. Good to file?

Best,  
Meeghan



---

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Tuesday, August 5, 2025 8:31 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, August 5, 2025 7:57 AM

**To:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

**Importance:** High

Edited the challenged exhibits table to mirror PTC order I just sent over to you.

No changes to the verdict form other than our insertion of an objection to your verdict form at end of document, right after your verdict form ends.

Please let us know asap if you have any changes. We need to start finalizing for filing ASAP.

Best,  
Meeghan



---

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Tuesday, August 5, 2025 7:49 AM

**To:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Apologies for the confusion. PTC order with the removal of your objections are attached. I used the clean PTC order you sent over in the attached email to remove objections and edit the objections to 4, 6, 72, and 104 (I just copied and pasted these).

Best,  
Meeghan



---

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>**Sent:** Tuesday, August 5, 2025 7:35 AM**To:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)**Importance:** High

Todd,

We removed objections to more exhibits in the attached. I was under the impression based on Arash's email yesterday that upon our removal of objections you would be removing objections as well. Specifically, Arash stated that he was "prepared to entirely remove our objections to your exhs. 1, 2, 10, 13-19, 30, 33-35, 57, 74, 76, 78, 80, 83-89, and 98-103 and remove objections, in part, to your exhs. 4, 6, 72, 104." Email is attached. Are you still removing those objections? If so, please so do now.

Best,  
Meeghan

---

**Meeghan H Tirtasaputra**

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**From:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>

**Sent:** Tuesday, August 5, 2025 6:56 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

Attached are proposed clean and redline version of the PTC Order. The redlines are formatting.

Please mark up the clean versions in redline if you make changes to the PTC Order and jury instructions and send back.

Either way, please circulate final versions for Arash's final approval. Thanks.

Regards,  
Todd

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 11:47 PM

**To:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Edited our objection and alternative proposed instruction to 1.11. If you're good with this, we can call it final.

Best,  
Meeghan



---

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**From:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>

**Sent:** Monday, August 4, 2025 10:35 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

Because we proposed instruction 1.11, we included our position for the instruction, as is, with the bracketed portion, inserted an objection (as I understand your position) and your proposed alternative instruction (without the brackets).

We edited our objection in response to your edit to 15.15. I did not see other substantive redlines (did you make others?). I did see yellow highlights, which I removed. Please send to me any further changes. Thank you.

Regards,  
Todd

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 9:59 PM

**To:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Todd,

I accepted your changes and made a few more redlines. We are keeping our edits to 1.11 and 15.11, so you are welcome to make objections to the same.

Best,

Meeghan



---

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**From:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>

**Sent:** Monday, August 4, 2025 7:18 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

I was working on your first redline document when you sent further redlines. Here are comments on your first set of redlines. Please work from this master document, as it seems unfair to ask us to copy and paste and redo changes in a new document.

We accepted your footnote 1 redline and edited our position (as now seen in redline).

We did not agree with the deletion of the bracket material on instruction 1.1 (limited purpose). That was one of our proposed instruction. We propose that it remains as is. The reason for the brackets is because no such instruction has been given yet.

We prefer the brackets in proposed 2.9, but its your proposal. If you remove the brackets, we have edited (in redline) our objection and proposed the model instruction as is.

We are okay with your redlines to 3.5, 4.1, 15.1, 15.2, 15.11, 15.22

In response to the removal of the brackets in 15.5, we edited our objection.

In response to 15.8, I don't understand the selective removal of brackets (see my proposed redline).



15.10 was more than removing brackets, thus we edited our objection.

Due to the edits and removal of brackets in 15.13 and 15.15, we now oppose these instructions, have inserted Plaintiff's (expected) positions and our responses in redline.

I will now turn to your follow-up emails. We, too, reserve our right to make further edits.

Regards,  
Todd

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Monday, August 4, 2025 4:59 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Attached for your review are the jury instructions with our redlines. Let me know if you have any further changes.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**  
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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Monday, August 4, 2025 3:42 PM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Mine. Yes.

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Monday, August 4, 2025 3:40 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Ok to sign Todd's name or yours?

Best,  
Meeghan



---

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Monday, August 4, 2025 3:28 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Thanks, Arash. We will get it filed now.

Best,  
Meeghan



---

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Senior Associate

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Los Angeles, CA 90067

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Monday, August 4, 2025 3:23 PM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

We are fine with your proposed edits to the joint statement of the case and suggest we file it today.

Arash

**Arash Beral** | BLANKROME

2029 Century Park East, Los Angeles, CA 90067

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 2:21 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Received. I've attached the joint statement of the case with our redline changes. I'm also available after 3:30 today to discuss the jury instructions. Let me know.

Best,  
Meeghan



---

**Meeghan H Tirtasaputra**

Senior Associate

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 1:14 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

See attached. I went through the jury instructions one last time to try and eliminate objections on our end. I also edited the verdict form. Apportionment and comparative fault are not currently addressed in the verdict form. Would be pleased to hear how your side desires to handle that.

Regarding the form of the jury instructions, our team has reviewed and re-reviewed the Court's Order at Dkt. 30 and we believe that the Court expects the document of disputed and undisputed instructions to be combined into one document with objections, responses, and proposed alternatives all included within it by order of instruction. Otherwise, the "clean" set template's "page no." section wouldn't work (i.e., we can't identify two separate "page no. 1's" referencing different docs). It needs to be one document. So we've combined it, which took a lot of time. If you have questions on this, please call Jamison.

Arash

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 11:54 AM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

Understood. We will wait to get your revised verdict form.

I've attached a final pre trial conference order here for your review. We are reviewing your proposed joint statement of the case and have a few edits. We will revert to you shortly.

Best,  
Meeghan



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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>**Sent:** Monday, August 4, 2025 11:50 AM**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan, I just noted a few mistakes in the verdict form in the sections relating to the PCJV party's claims against your clients. We're going to have another draft to you soon alongside the jury instructions. In the meantime, please send the other docs for our review.

**Arash Beral | BLANKROME**

2029 Century Park East, Los Angeles, CA 90067

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---

**From:** Beral, Arash**Sent:** Monday, August 4, 2025 11:23 AM**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Meeghan,

We are almost finished with our edits to the jury instructions. Suggest your team and our team get on a call to discuss them and determine if we could narrow disputes. We'll get those over to you very shortly. In the meantime, we took a crack at a new proposed joint statement of the case, intended to be as objective and neutral as possible. Please review. Please review the verdict form attached.

Arash

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---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Monday, August 4, 2025 9:47 AM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Thanks, Arash. We should have the other docs to you shortly.

Best,  
Meeghan



---

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Monday, August 4, 2025 9:45 AM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** [EXT] Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Almost ready. Where are you guys on the rest of the docs?

On Aug 4, 2025, at 8:44 AM, Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)> wrote:

Arash,

I'm following up on the verdict form and jury instructions we sent over on Friday. Please let us know when you'll be circulating those with your changes / additions.

Best,  
Meeghan

**Meeghan H. Tirtasaputra**  
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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Friday, August 1, 2025 5:45 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash,

In accordance with the Court's Civil Pretrial and Trial Order (dkt. 30), we separated the jury instructions into joint, separate, and clean. Accordingly, attached are the following documents for your review:

1. Proposed joint jury instructions (containing the agreed upon jury instructions)
2. SPAVI's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
3. PCJV's separate and disputed joint jury instructions (which contain objections and alternative jury instructions)
4. Clean proposed jury instructions (containing only the agreed upon jury instructions for now but which will need to include the disputed once those are finalized) (made



in accordance with the court's civil pretrial and trial order as well as the Court's  
clean jury instruction template on its website)

5. Revised verdict form

If you have any questions or concerns, please let us know.

Best,  
Meeghan



---

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Friday, August 1, 2025 2:58 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison

<[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>;

Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V.

<[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** Re: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

we have taken it upon ourselves to reformat all of these documents to make sure that they are compliant with the Court order particularly. You're not gonna get them today. You will get them likely at some point this weekend. My request is that you make sure that all of the objections and information and complaints and grievances that you have are stated in the current document so that we can make sure that they make in the properly formatted documents. We're not gonna be able to get into the endless cycle of objection counter objection, and counter counter objection anymore. We have much more serious things to worry about. As soon as I have an update as to win, we will get you final documents to approve, I will let you know.

Highberger goes please do not communicate with his courtroom without copying me.

---

**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Friday, August 1, 2025 2:50:22 PM

**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Mike,

Following up. We need your materials to review over the weekend. Please send by 4:30 pm. We have a lot to do, and I wish to avoid another all-nighter on Monday night.

With respect to the state court order, I called Judge Highberger's department and informed the judicial assistant that you and we are not available Friday morning in light of the PTC in this case. The judicial assistant informed me that he would get back to me.

Arash

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Sent:** Wednesday, July 30, 2025 9:16 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Arash:

We are duty bound to respond to the new objection material you added in this document, which it took you 24 hours to prepare. We are duty bound to respond and so have to further add information. We have a new deadline for the filing and we will meet it,

Mik

<[image001.jpg](#)>

<[image001.jpg](#)>

**Michael Murphy**

Partner

<image001.jpg>

(213) 213-1211

<image001.jpg>

(310) 974-2271 (cell)

<image001.jpg>

[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

<image001.jpg>

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 6:33 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Fox Rothschild Team,

Please advise re: status of the PTCO and joint jury instructions.

Please also advise when tomorrow or Friday you are available to meet and confer on all the pretrial docs.

Arash

**Arash Beral | BLANKROME**

2029 Century Park East, Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

---

**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Wednesday, July 30, 2025 3:12 PM

**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Counsel,

Please see the attached proposed final for review, which includes Defendants' portions addressing the new jury instructions, objections and proposals. We had to spend significant time reviewing changes we received to most if not all alternatively proposed instructions, as well as assess newly asserted objections to instructions and position statements. Please review. We will do a final review too, so we can get this on file as soon as possible.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Sent:** Wednesday, July 30, 2025 1:36 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>

**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

To be clear, there were no “new” jury instructions in the document we circulated last night. As I mentioned in my prior emails, there was **one** jury instruction that I inserted into the draft but which was previously circulated to your office on Monday in a redline. This one jury instruction did not make it into the draft your office then circulated yesterday purporting to incorporate our edits from the Monday redline document.

Other than these, we made typographical and formatting corrections and inserted objections.

Best,  
Meeghan

<image001.jpg>

<image001.jpg>

**Meeghan H Tirtasaputra**

Senior Associate

10250 Constellation Boulevard

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Los Angeles, CA 90067

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Wednesday, July 30, 2025 1:14 PM  
**To:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jessica,

We have been working to address your new jury instructions. We will send a response as soon as we can.

**Jamison T. Gilmore** | BLANKROME  
2029 Century Park East | 6th Floor | Los Angeles, CA 90067  
+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

---

**From:** Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>  
**Sent:** Wednesday, July 30, 2025 12:31 PM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Jamison,

We're following up on Meeghan's email below. Can you please let us know when we can expect your response as we still need to file this and the PTC Order, in order to prepare the trial binder and deliver it to the court.

Thanks,

<[image001.jpg](#)>

<image001.jpg>

**Jessica Nwasike**

Associate

10250 Constellation Boulevard

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<image001.jpg>

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[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)

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**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Tuesday, July 29, 2025 8:53 PM  
**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Jamison,

It seems there was only one instruction that did not make it into the one you circulated today, which is Instruction 4.5 Agent – Scope of Authority Defined.

I did not make any substantive changes to the instructions other than some typos here and there. Any additional words were made in redline. For example, I added the words “special instruction” before the title of the following instructions:

- Quantum Meruit – Defined (page 126)
- Quantum Meruit – Essential Elements (page 127)
- Misappropriation of Trade Secrets – Essential Factual Elements (page 128)
- Misappropriation of Trade Secrets – “Trade Secrets” Defined (page 129)
- Misappropriation of Trade Secrets – Secrecy Requirement (page 131)
- Misappropriation of Trade Secrets – Reasonable Efforts to Protect Secrecy (page 132)
- Misappropriation of Trade Secrets – Misappropriation by Use (page 134)
- Improper Means of Acquiring Trade Secret (page 135)
- Misappropriation of Trade Secrets – “Independent Economic Value” Explained (page 136)

There were also a couple of instructions that did not have any objections to which we added objections and added a space for you to add your objections / response. Those were highlighted for you.

I’ve attached the jury instructions again to the extent you didn’t receive the version with the redlines in them.

Best,  
Meeghan

<[image001.jpg](#)>

<[image001.jpg](#)>

**Meeghan H Tirtasaputra**

Senior Associate

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Los Angeles, CA 90067

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[mtirtasaputra@foxrothschild.com](mailto:mtirtasaputra@foxrothschild.com)  
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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Tuesday, July 29, 2025 8:01 PM  
**To:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

Hi Meeghan,

Thank you for this. Please:

1. Identify the jury instructions you contend were missing.
2. Identify the jury instructions that were changed after receiving our substantive responses.

Thank you,

**Jamison T. Gilmore** | BLANKROME  
2029 Century Park East | 6th Floor | Los Angeles, CA 90067  
+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

---

**From:** Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Sent:** Tuesday, July 29, 2025 6:55 PM  
**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Tirtasaputra, Meeghan H. <[MTirtasaputra@foxrothschild.com](mailto:MTirtasaputra@foxrothschild.com)>  
**Subject:** SPAVI v. PCJV - Final Proposed Jury Instructions (with SPAVI Inserts)

All,

Attached is a draft proposed jury instructions with SPAVI's objections. There were one or two jury instructions from our redlined version circulated yesterday that did not make it into the one circulated by Blank Rome today, so I inserted those in redline. Also, the formatting throughout the document was very inconsistent and wonky in some places, so

we unified the formatting to make the document consistent throughout. Any substantive changes to the jury instructions (not including Spavi's objections) were made in redline.

Please let us know if you have any questions or concerns.

Best,  
Meeghan

[<image001.jpg>](#)

<image001.jpg>

**Meeghan H Tirtasaputra**

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Thank you.